



**U.S. Department of Justice**

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District of New Jersey  
*Civil Division*

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February 10, 2021

**Via Electronic Filing**

Hon. Renée Marie Bumb, U.S.D.J.  
Mitchell H. Cohen U.S. Courthouse  
One John F. Gerry Plaza  
Fourth and Cooper Streets  
Camden, NJ 08101

Re: *Burris v. Ortiz*  
Civil Action No. 21-338 (RMB)

Dear Judge Bumb:

I am the Assistant U.S. Attorney assigned to represent Respondent Warden Ortiz in the above-referenced petition for writ of habeas corpus filed under 28 U.S.C. § 2241. In the petition, Petitioner Jeffrey Burris alleges that the Federal Bureau of Prisons ("BOP") failed to award him 255 days of earned time credits pursuant to the First Step Act. *See* ECF No. 1. The Court ordered Respondent to answer the petition within thirty days from the date of the entry of the Order. *See* ECF No. 2. Respondent's answer is currently due February 12, 2021.

I write to request a two-week extension of time by which a response must be filed. The new due date would be February 26, 2021. The BOP requires additional time to review relevant records and recent decisions concerning earned time credits. The extension will provide sufficient time for Respondent to respond fully to the factual and legal allegations of the petition.

According to BOP documents, Petitioner is scheduled for release on July 14, 2022. Respondent therefore respectfully submits that the requested extension will not prejudice his interests.

If this request meets with the Court's approval, I ask that you kindly "So Order" this letter and have a "filed" copy returned to the parties via the Court's ECF system.

Honorable Renée Marie Bumb, U.S.D.J.

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I thank the Court for its consideration of this matter.

Respectfully submitted,

RACHAEL A. HONIG  
Acting United States Attorney

*s/Elizabeth A. Pascal*  
By: ELIZABETH A. PASCAL  
Assistant U.S. Attorney

cc: Jeffrey Burris (via regular mail)  
Reg. No. 14601-088  
Petitioner *pro se*